

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

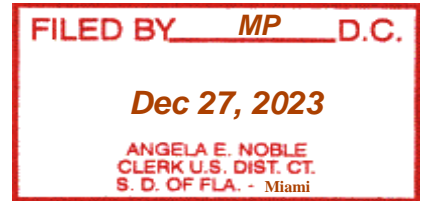
CASE NO. 1:23mj04485 Goodman

UNITED STATES OF AMERICA

vs.

ANDELO PEJAKOVIC,

Defendant.



CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? No.
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? No.
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

BY: /s/ Daniel Rosenfeld
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United States District Court

SOUTHERN

DISTRICT OF

FLORIDA

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

ANDELO PEJAKOVIC

CASE NUMBER: 1:23mj04485 Goodman

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about December 24, 2023, at the Miami International Airport, in Miami-Dade County, in the Southern District of Florida, the defendant, ANDELO PEJAKOVIC did, in a matter within the jurisdiction of the executive branch of the United States, knowingly and willfully make or use any false writing or document knowing the same to contain a materially false, fictitious or fraudulent entry or statement as to a material fact, in violation of Title 18, United States Code, Section 1001(a)(3).

I further state that I am an Enforcement Officer with U.S. Customs and Border Protection ("CBP"), and that this complaint is based on the following facts:

On or about December 24, 2023, the defendant, ANDELO PEJAKOVIC, arrived at Miami International Airport on Royal Dutch Airlines Flight 627 from Amsterdam, the Netherlands. The defendant presented a Bosnian passport, U.S. visa, and an employment letter from Royal Caribbean to CBP for an examination and entry into the United States. The employment letter purported to guarantee the defendant employment aboard a Royal Caribbean cruise ship. The defendant told the primary officer that he was going to work on a cruise ship. The defendant was referred to secondary inspection for admissibility verification. During an examination of the defendant's travel documents, CBP Officers discovered that the employment letter presented by the defendant was not genuine. CBP Officers contacted Royal Caribbean for employment verification for the defendant. Royal Caribbean indicated that the defendant was not employed by the cruise line. The defendant admitted that he had presented a fraudulent employment letter in order to gain entry to the United States. The defendant further admitted to buying the employment letter on the internet.


NARCISO FERNANDEZ, ENFORCEMENT OFFICER
U.S. CUSTOMS AND BORDER PROTECTION

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by WhatsApp.

12/25/2023

Date

at

Miami, Florida

City and State

JONATHAN GOODMAN
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer


Signature of Judicial Officer